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constitution of the State of Georgia, that a city has no authority to impose a compulsory system of passenger transfer upon a street railway company, 83 Fed. affirmed.

CARRIERS.—INJURY TO PASSENGERS.—ESCORT.—*JOHNSON v. SOUTHERN RY. CO.*, 31 S. E. 212. (S. C.).—"A female holding a ticket entitling her to transportation as a passenger on a railroad train, if feeble, or incumbered with heavy baggage or other impediments, is entitled to have assistance in boarding the train; and if the same is not afforded her by the railroad officials or servants, her husband or other escort may render her the necessary assistance, and is entitled to a reasonable time to leave the train before it is put in motion. Where a husband was rendering this assistance, but had not time to leave the train, it only stopping half a minute because it was late, and where the conductor had notice after the train had started that plaintiff wished to leave the train, the plaintiff was allowed to recover for injuries incurred while leaving the train.

CONSTITUTIONAL LAW.—EQUAL PROTECTION OF THE LAW.—*PLUMBERS' LICENSES*.—*STATE EX REL. WINKLER v. BENZENBERGER, ET AL.* COMMISSIONERS OF PUBLIC WORKS.—A law requiring that master and journeymen plumbers must be examined and licensed before they can engage in the business of plumbing, provided that the examining or licensing of one member of a firm, or the manager of a corporation doing a plumbing business, should satisfy the requirements of the Statute. *Held*, that the law was unconstitutional as denying to plumbers doing business alone the equal protection of the law. For a recent Ohio case to the same effect see *YALE LAW JOURNAL*, vol. VIII, page 56.

CONSTITUTIONAL LAW.—INTERFERENCE WITH INTERSTATE COMMERCE.—CONVICTS.—*PEOPLE v. HAWKINS*, 51 N. E. Rep. (N. Y.) 257. Laws 1896, C. 931, make it a misdemeanor to sell or expose for sale goods made in any prison, without labeling them "Convict made," with the year and name of prison. *Held*, that this Statute as applied to articles made without the State, is void, as violating Const. U. S., Art. 1, § 8, subd. 3, empowering Congress to regulate commerce among the States.

Parker, C. J., and Bartlett and Haight J. J., dissented on the ground that such Statute was within the police power of the State to promote public welfare and prosperity. *Cf. YALE LAW JOURNAL*, 44,

CONSTITUTIONAL LAW.—INTERNAL REVENUE ACT OF 1898.—SALES ON BOARD OF TRADE—*NICOLL v. AMES*, 89 Fed. Rep. 144—Schedule A, ¶ 2 of the Internal Revenue Act of 1898, imposes a tax upon each sale, agreement of sale, or agreement to sell, any products or merchandise at any exchange, or board of trade, or other similar place, and requires, upon the making of any such sales or agreement, the delivery by the seller to the buyer of a written bill or memorandum, to which shall be affixed stamps in value equal to the amount of the tax. *Held*, that such an act fell within Section 8, Art. I, of the Constitution of the United States, giving Congress power "to lay and collect taxes, duties, imports, and excises, to pay the debts and provide for the common defense and general welfare of the United States; but all duties, imports and excises shall be uniform throughout the United States." But such a tax is not in violation of the rule of uniformity, for, it being limited to sales made at an exchange, board of trade, or similar place, is in effect a tax upon the privilege of selling at such places, graduated according to the use made of such privilege, and not upon either the document required, the product sold, or the occupation, aside from such privileges.